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May 9, 2007
VIA HAND DELIVERY

Judge Mark L. Wolf
United States District Court
For the District of Massachusetts
John Joseph Moakley U.S. Courthouse
One Courthouse Way, Ste. 2300
Boston, MA 02210

FILED
CLERK'S OFFICE
2007 MAY -9 P 3:59
U.S. DISTRICT COURT
DISTRICT OF MASS.

Re: In re Viisage Technology, Inc. Securities Litigation
Civil Action No. 05-cv-10438-MLW

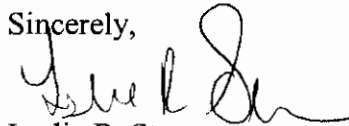
Dear Judge Wolf:

We are Liaison Counsel for the Plaintiffs and are writing to request the Court to enter the Proposed Joint Pretrial Scheduling Order submitted on behalf of all parties on April 20, 2007. (A Copy of the proposed Order is attached for the convenience of the Court.)

As set forth in our letter of April 20 (also attached) that proposal allowed until May 14, three weeks from April 20, before pre-trial proceedings commenced to allow for further settlement negotiations. Counsel for the parties have now had the opportunity to meet with the insurance carrier, but have been unable to reach a settlement of the action and are not planning on further settlement negotiations at this time. Accordingly, we respectfully request that the Court enter the proposed Pretrial Order no later than May 14.

If the Court has any questions, we suggest a short conference.

Sincerely,



Leslie R. Stern

cc: Mitch Kaplan, Esq.
Jeffrey Klafter, Esq.
Kurt Olsen, Esq

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**April 20, 2007
VIA ELECTRONIC FILING**

Judge Mark L. Wolf
United States District Court
for the District of Massachusetts
John Joseph Moakley U.S. Courthouse
Suite 2300
1 Courthouse Way
Boston, MA 02210

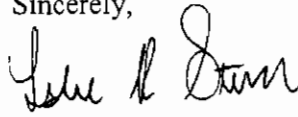
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2007 MAY -9 P 3:59
CLERKS OFFICE**

**Re: In re Viisage Technology, Inc. Securities Litigation
Civil Action No. 05-cv-10438-MLW**

Dear Judge Wolf:

Pursuant to Your Honor's Order entered February 28, 2007, enclosed please find a courtesy copy of the parties' agreed upon proposed Joint Pretrial Scheduling Order, which has been e-filed with the Court. As you will note, the parties have built in a three-week delay before formal discovery begins. This is to permit further efforts to resolve the Action. As we agreed at the last Conference, the parties have exchanged informal discovery and settlement proposals. While the parties have not reached agreement, and there can be no assurance that they will, the proposed Order reflects a mutual belief on the part of the parties that it makes sense to delay the commencement of discovery for the limited time provided to continue their negotiations. Accordingly, we respectfully request that the Proposed Order be entered by the Court.

Sincerely,



Leslie R. Stern



**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**In re VIISAGE TECHNOLOGY, INC.
SECURITIES LITIGATION**

Civil Action No. 05-cv-10438-MLW

This Pleading Applies to: All Actions

PROPOSED JOINT PRETRIAL SCHEDULING ORDER

In accordance with the Court's Order dated February 27, 2007, counsel hereby submit this Proposed Pretrial Schedule.

I. ANSWER

The defendants shall file an answer to the Amended Consolidated Complaint by May 14, 2007.

II. PLAINTIFFS' MOTION FOR CLASS CERTIFICATION

The parties propose the following briefing schedule with respect to class certification:

1. Plaintiffs will file and serve their motion for class certification within forty-five (45) days of May 14, 2007 (the "Discovery Commencement Date.")

2. Class certification discovery may be served immediately following the Discovery Commencement Date and will be completed sixty (60) days after Plaintiffs file their motion for class certification.

3. Defendants will file and serve their opposition brief to class certification thirty (30) days after class certification discovery is completed.

4. Plaintiffs will file and serve a reply brief in support of their motion for class certification thirty (30) days after Defendants file and serve their opposition brief to class certification.

5. Plaintiffs will request oral argument on their motion for class certification.

III. DISCOVERY AND PRETRIAL DEADLINES

The parties propose the following schedule for discovery and retrial deadlines:

Rule 26(a) Initial Disclosures

1. The parties will exchange their initial disclosures required by Rules 26(a)(1) (A), (C) and (D) of the Federal Rules, within fourteen (14) days of the Discovery Commencement Date.

Fact Discovery

2. Document requests may be served at any time immediately following the Discovery Commencement Date, and interrogatories may be served in accordance with Local Rule 33.1 of this Court.

3. The parties shall submit a confidentiality stipulation and order to the Court for its approval or, if they are unable to agree, a motion for the entry of such an order, no later than twenty-one (21) days after the Discovery Commencement Date. Pending the entry of a confidentiality order by the Court, confidential documents shall be produced and treated as confidential information to be used solely for purposes of this litigation.

4. All fact discovery will be completed within nine (9) months after the Discovery Commencement Date ("Fact Discovery Cutoff").

Expert Discovery

5. Plaintiffs shall serve their expert report(s) in compliance with Fed. R. Civ. P. 26(a)(2)(B) within thirty (30) days following the Fact Discovery Cutoff.

6. Defendants shall serve their expert report(s) in compliance with Fed. R. Civ. P. 26(a)(2)(B) within thirty(30) days following service of Plaintiffs' expert report(s).

7. Plaintiffs shall serve any rebuttal expert report(s) in compliance with Fed. R. Civ. P. 26(a)(2)(B) within thirty (30) days following service of Defendants' expert report(s).

8. Subsequent to the service of all of the respective expert reports, the parties' experts will be deposed, with Plaintiffs' expert(s) (other than any rebuttal experts) in any given area (*e.g.*, damages) to be deposed before Defendants' expert(s) in that same area.

9. Expert discovery will be completed within sixty (60) days following service of Plaintiffs' rebuttal report(s).

Joining Additional Parties and Amending the Pleadings

10. A motion for leave to amend pleadings or to join additional parties may be filed until 30 days after the Fact Discovery Cutoff.

IV. DISPOSITIVE MOTIONS

1. Any motion for summary judgment will be filed and served no later than thirty (30) days after the completion of expert discovery.

2. Opposition briefs will be filed and served thirty (30) days after service of the opening brief.

3. Reply briefs will be filed and served fifteen (15) days after service of the opposition brief.

Dated: April __, 2007

MARK L. WOLF
UNITED STATES DISTRICT JUDGE

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**In re VIISAGE TECHNOLOGY, INC.
SECURITIES LITIGATION**

Civil Action No. 05-cv-10438-MLW

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CERTIFICATE OF SERVICE

I, Leslie R. Stern, hereby certify that Proposed Joint Pretrial Scheduling Order filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: April 20, 2007

/s/ Leslie R. Stern
Leslie R. Stern